U.S. Department of Justice



United States Attorney Southern District of New York

MEMO ENDORSED

BY FACSIMULE: (212) 805-6326 The Honorable Colleen McMahon United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

The Silvio J. Mollo Building One Sains Andrew's Plaza New York, New York 10007

2007 Gladet Land Land Consent December 19, 2007

United States v. Mutholib Sanni and Francia Tabares Re:

07 Cr. 999 (CM)

Dear Judge McMahon:

The Government respectfully submits this letter, after speaking with Your Honor's Deputy, to request jointly with the defense an adjournment of the pre-trial conference currently scheduled for December 18, 2007 to January 24, 2008, at 9:30 a.m.

The Government also respectfully requests that time be excluded for purposes of the Speedy Trial Act from today through January 24, 2008. The Government makes this request, with the consent of defense counsel, to permit the defense to review discovery, and for the Government and the defense to pursue discussions regarding a possible disposition before trial.

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12 30 0'1

Respectfully submitted,

MICHAEL J. GARCIA United States Attorney

By:

Eugene Ingoglia Assistant U.S. Attorney (212) 637-1113

Roy Kulcsar, Esq., counsel for Francia Tabares (fax: 201-439-1478) CC: John M. Murphy, Jr., Esq., counsel for Mutholib Sanni (fax:718-448-8685)